

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

**TIMOTHY KELLY, on behalf of
himself and all others similarly situated,**

Plaintiff,

v.

Civil Action No 3:13-cv-311 (JAG)

NATIONSTAR MORTGAGE, LLC,

Defendant.

CORPORATE DEPOSITION NOTICE

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, on 4th day of February, 2014, beginning at 10 a.m. at the offices of Troutman Sanders, 1001 Haxall Point, Richmond, VA 23219, Plaintiff by counsel will take the following deposition(s) by video and stenographic means, of the designated representatives of Nationstar Mortgage, LLC with knowledge of the following:

1. The history and corporate structure of Nationstar Mortgage, LLC and its subsidiaries.
2. Nationstar Mortgage, LLC's Retention Procedures, including but not limited to:
 - a. Policies and procedures related to document retention;
 - b. Policies and procedure relating to document destruction;
 - c. Policies and procedures relating to computer and/or online backup;
 - d. Destruction of any documents relating to this matter;
 - e. Destruction of any communications relating to this matter.
3. Information regarding any Nationstar Mortgage, LLC employee(s) who handled Plaintiff's mortgage loan, including their:
 - a. Educational Background;

- b. Qualifications;
- c. Training received;
- d. Evaluations;
- e. Disciplinary Actions;
- f. Job Description;
- g. Compensation Structure;
- h. Their review of the Plaintiff's files;
- i. Any and all facts regarding communications with Plaintiff;
- j. Their current employment status.

4. All phone records, including notes, between Nationstar Mortgage, LLC and Plaintiff from January 1, 2011 through January 1, 2013.

5. All communications between Nationstar Mortgage, LLC and Plaintiff in this matter or the property that is the subject of this lawsuit.

7. The existence, content, and delivery of any change of servicing notices, default notices or notices of intent to accelerate sent to the Plaintiff or the putative class.

8. Any and all correspondence between Nationstar Mortgage, LLC and Plaintiff regarding the Plaintiff's loan or foreclosure.

10. Any and all fees received or paid by Nationstar Mortgage, LLC in connection with the servicing of Plaintiff's home.

11. Any documents referencing the Plaintiff's mortgage loan.

12. Any and all factual allegations in the Plaintiff's Complaint.

13. Any and all facts concerning the creditor that you serviced Plaintiff's loan on behalf of from the date you became the servicer to the present.

14. Nationstar Mortgage, LLC's net worth, including financial statements for 2011 through 2013.

15. Any defenses Nationstar Mortgage, LLC intends to assert in opposition to class certification.

16. Computer programs, systems or databases used to maintain, operate or record Nationstar Mortgage, LLC's communications with homeowners in connection with loan modification applications, foreclosure sales, debt collection, or accelerated mortgage loans.

17. Facts in support of any defenses asserted by Defendant.

18. Procedures and policies for referring loans to foreclosure using Nationstar Mortgage, LLC's automated loan servicing and default servicing software or program.

19. All facts regarding your relationship with any creditors you service loans on behalf of, including but not limited to:

- a. Contractual agreements between any creditors you service loans on behalf of and Nationstar Mortgage, LLC;
- b. Payments made to or received from creditors you service loans on behalf of in exchange for the servicing of the loans in default;
- d. Any rating system for default servicing used by Nationstar Mortgage, LLC;
- e. Nationstar Mortgage, LLC's duties and responsibilities with respect to overseeing the servicing of loans in default;
- f. Nationstar Mortgage, LLC's computer software or other automated program used with respect to the servicing of mortgage loans or the referral of loans to foreclosure or other default management processes.

TAKE NOTICE and govern yourself accordingly.

Respectfully submitted,
TIMOTHY KELLY
By Counsel



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CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of January, 2014 I have sent a copy of the foregoing by electronic and regular mail to the following individuals:

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